



July 16, 2007

The Honorable Dan Blair
Chairman
Postal Regulatory Commission
901 New York Ave NW Suite 200
Washington DC 20268-0001

Re: Order and Request for Comments, Docket No. PI-2007-1

Dear Chairman Blair:

Development and continual, consistent achievement of delivery service standards for the USPS would result in a higher level of customer satisfaction for both the small and large consumer of postal products. It is because of the critical need for service standards that Transcontinental Direct has been an active participant on MTAC Work Group #114, Service Standards and Measurements and fully supports those recommendations being made by the group. As a major supplier of direct mail services, these services standards enable us to help support our clients with their marketing campaigns.

Some examples of what service standards will provide:

- Timely advertising flyer delivery for consumer retail sales
- Mail owners the ability to plan call center staffing based on estimated in-home delivery
- The ability to coordinate multi-media programs
- Targeted in-home merchandise for consumer product satisfaction
- Consumer confidence in the USPS

Just as critical to the development of these service standards is the ability to maintain and measure achievements of the USPS with industry access to these results. Aggregate on-line service performance data will help us help our clients to better manage their drop strategies to either level load their call centers or hit a specific in-home delivery window for a retail sales event. An accurate electronic picture of delivery data will allow us to be in a position to do more worksharing to improve the delivery performance of mail; giving our clients a consistent and predicable delivery experience in exchange for their postal spend.

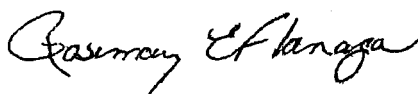
The most logical product for measurement is through automation. As the Postal Service has already deployed throughout its system the ability to read barcodes on a high percentage of the mail processed and this would be the most reliable source for information. The data is gathered as the mail pieces are being processed for delivery within the postal system. It would be difficult for the postal service to dispute these automated findings, just as it would be difficult for the industry to dispute preparation, sortation and mail piece design issues from these same pieces of automation equipment. A concern may be that this automation technology is not deployed fully across all the mail pieces within the mail stream. The question becomes can we afford not use the information that is available to us today while we build the system of the future?

In addition to development of these service standards is the reasonable achievement percentage of these expectations. We can measure to these standards but unless there are goals that expected to be achieved throughout the postal system these standards of tomorrow will quickly erode at the "guidelines" of today. Achievement levels which allow the postal service the ability to remain competitive within their various markets while also maintaining a very high customer satisfaction level should be determined at the same time these standards are implemented. We do not advocate any penalties be imposed on facilities not meeting these goals, we believe that public perception of missed standard would be the motivating factor to continuous improvement.

In conclusion, the implementation and measurement of service standards requires walking a fine line between cost and service. It is important to use all systems which are currently available within the postal service to achieve the expected outcome. We fully appreciate the Postal Regulatory Commission's responsibility to develop this portion of critical framework for the future of the USPS while not overburdening either the USPS or the industry with additional costs.

Your consideration of these comments is appreciated.

Sincerely,



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